

Robert E. Feldman  
Executive Secretary  
Attn: Comments/Legal ESS, Room 3060  
Federal Deposit Insurance Corporation  
550 17<sup>th</sup> Street, NW  
Washington, DC 20429

Re: Application for Deposit Insurance for Wal-Mart Bank

March 27, 2006

Dear Mr. Feldman:

On behalf of MoneyGram International, Inc., (MGI), I am submitting comments regarding MGI's business relationship with Wal-Mart. MGI's money orders and money transfers are sold through the thousands of retailers and financial institutions around the world. Wal-Mart is an important component of this distribution network. MGI and Wal-Mart have been business partners for a number of years during which time Wal-Mart has been an important seller of MGI's money orders and money transfers. MGI values its relationship with Wal-Mart, and appreciates Wal-Mart's ability to serve consumers in many diverse communities throughout the United States.

While MGI does not have sufficient knowledge of the bank application to comment on its merits, MGI can state that it has no concern that the approval of such an application would adversely impact MGI's interests. Regardless of the outcome, MGI intends to continue working with Wal-Mart to deliver money order and money transfer services to consumers in an affordable, reliable and convenient manner.

Sincerely,

Daniel (Dan) J. O'Malley  
Vice President of the Americas